## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Case No. 12-25797 JAD
Diana Lynn Curley Debtor	Chapter 13
Diana Lynn Curley Movant	Related to Document Nos. 119, 159
	Hearing Date: 12/16/2014 at 9:30 a.m.
VS.	) Response Date: 12/15/2014
Bank of America Home Loans	, )
Respondent	)

## NOTICE OF PROPOSED MODIFICATION TO CONFIRMED CHAPTER 13 PLAN DATED September 15, 2014

- 1. Pursuant to 11 USC §1329, the Debtor has filed an Amended Chapter 13 Plan dated April 18, 2017, which is annexed hereto as Exhibit "A". Pursuant to the aforesaid Court Order, and the attached Amended chapter 13 Plan, the Debtor seeks to modify the confirmed plan in the following particulars:
- a. The plan has been amended to comply with the Notice of Mortgage payment change and the Order filed at Document No. 159.
- 2. The proposed modification to the confirmed plan will impact the treatment of the claims of the following creditors, and in the following particulars:
- a. The amended plan will correct the mortgage payment.
- 3. Debtor submits that the reason for the modification is as follows:
- a. The Amendment is intended to correct the mortgage payment to comply with the mortgage payment change notice.
- 4. Debtor submits that the requested modification is being proposed in good faith, and not

for any means prohibited by applicable law. The debtor further submits that the proposed modification complies with 11 USC §§1322(a), 1322(b), 1325(a) and 1329, and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 plan.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order confirming the amended chapter 13 plan, and for such other relief as the Court deems equitable and just.

Dated: April 20, 2017 Respectfully submitted,

/s/Mary Bower Sheats
Mary Bower Sheats
Pa. I.D. # 27911
707 Grant Street, Suite 3300
Pgh. PA 15219
(412) 471-5931
Fax: 412 471-7351

Email: mbsheats@fgbmp.com